

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

NEW ENGLAND CENTRAL RAILROAD, INC.,
Plaintiff,

v.

SPRINGFIELD TERMINAL RAILWAY
COMPANY and BOSTON AND MAINE
CORPORATION,
Defendants.

Civil Action No.: 04-30235-MAP

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Pursuant to the Court's order of February 6, 2007, the defendants, Springfield Terminal Railway Company and Boston and Maine Corporation (collectively, "Springfield") hereby submit proposed voir dire questions for potential jurors in this action.

1. Have you or a close family member or friend ever been employed by any of the parties to this action—Boston and Maine Corporation, Springfield Terminal Railway Company, New England Central Railway (which formerly was called the Central Vermont Railway)? If so, please give the approximate dates of such employment, jobs held, and reasons for termination of the employment.

2. Have you heard anything about any of the parties to this action? If so, what have you heard and from what source(s)?

3. Have you or a close family member or friend ever had any business dealings with any of the parties to this action? If so, please indicate the nature of the business dealings,

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whether the dealings were in any way contentious, and the end result of the dealings.

4. Have you or a close relative or friend ever worked in a job where strict adherence to safety rules is essential? If so, what was the job and what were the risks attendant on failing to follow the safety rules.

5. Have you or a close family member or friend ever been injured in a transportation-related accident? If so, please explain the circumstances of the accident, whether any injury or damage claims were made, whether any lawsuits were filed regarding such claims, and the result of any such claims or lawsuits.

6. Do you consider yourself a railroad buff?

7. Have you ever served on a jury? If so, what kind (or kinds) of case(s) was it?

Respectfully submitted,

/s/ Eric L. Hirschhorn
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*Attorneys for Defendants Springfield
Terminal Railway Co. and Boston and
Maine Corp.*

Dated: September 10, 2007

CERTIFICATE OF SERVICE

I hereby certify that service of the Defendants' Proposed Voir Dire Questions will be made on counsel for NECR, the plaintiff/counterdefendant, by means of the Court's electronic filing system.

A handwritten signature in black ink, appearing to read "Eric L. Hirschhorn", written over a horizontal line.

Eric L. Hirschhorn

Dated: September 10, 2007